

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-16, 17(A), 17(E-H), 18-21)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-16, 17(a), 17(e-h), 18-21, filed on December 8, 1998. Objections to interrogatories OCA/USPS-17(b-d), 22 were filed on December 14, 1998.


Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

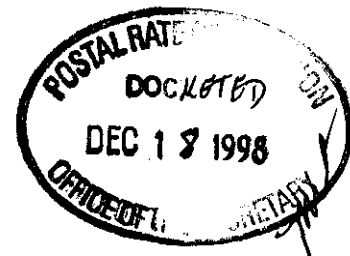
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
December 18, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE
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OCA/USPS-16. Please refer to the "USPS Qualification Report," appearing at Tr. 6/1423, and to MOL Weekly Report, AP2, Week 4, Tables 2 and 3, filed December 3, 1998.

- a. Please confirm that the Qualification Report reflects an actual mailing. If you do not confirm, please explain.
- b. Please confirm that the Qualification Report is dated October 31, 1998. If you do not confirm, please explain.
- c. Please confirm that the Qualification Report was for a one-piece mailing. If you do not confirm, please explain.
- d. Please confirm that Tables 2 and 3 show a two-page mailing and a three-page mailing for October 31. Please confirm that these Tables do not explicitly show the numbers of *pieces* in individual mailings. Please explain how the volumes of individual mailings can be determined from the Weekly Reports.
- e. Please confirm that the Qualification Report is postmarked November 2, 1998. If you do not confirm, please explain.
- f. Please confirm that Tables 2 and 3 show no mailings of any kind on November 2, 1998. If you do not confirm, please explain.
- g. Please confirm that Tables 2 and 3 show that one mailing consisting of one piece was recorded on November 3, 1998. If you do not confirm, please explain.
- h. Do the October 31 Qualification Report data appear in Tables 2 and 3 under November 3? Do the October 31 Qualification Report data appear anywhere in the Weekly Reports filed December 3?
- i. How does one match Qualification Report data to MOL Weekly Reports?
- j. Do the dates used for column headings in the Weekly Reports refer to date of job submission, date of transmission to printer, date of printing, date of acceptance into mail processing, or some other date? Is the reference consistent across dates? Please explain.
- k. Does a "date" run from midnight to midnight eastern time? If not, please define the time period covered by a "date."
- l. Please confirm that transactions submitted on either side of the 2:00 cutoff time (e.g., at 1:00 and at 3:00) are reported as occurring on the same date, even though such transactions will not be transmitted to the printer on the same date. If you do not confirm, please describe how the 2:00 cutoff time affects transactions as they appear in the MOL Weekly Reports.

RESPONSE:

- a. Confirmed.
- b. Confirmed.

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- c. Confirmed.
- d. Confirmed. However, volumes of individual mailings generally cannot be determined from the Weekly Reports, which aggregate mailings either by day or by week. Therefore, one can determine the volumes of respective customer submissions from the Weekly Reports only when just one mailing occurs during the pertinent time period. If both October 31 mailings had instead been black and white, one would be unable to determine whether one job was four pages and the other one, or whether one job was three pages and the other two.
- e. Confirmed that the Qualification Report is date stamped November 2, 1998.
- f. Confirmed.
- g. Confirmed.
- h. The job reflected in the qualification report reproduced in the transcript (Tr. 6/1423) was a test job produced internally, not one stemming from a customer. This is consistent with the description of the qualification report as a "sample". Tr. 6/1419. Since the purpose of the market test is evaluation of customer preferences and demand, the Weekly Reports only reflect customer jobs.
- i. That cross-walk cannot be accomplished with the data currently being provided to the Commission or via discovery. See *a/so*, the response to interrogatory OCA/USPS-17(h).

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- j. Dates for the column headings refer to dates when jobs were submitted and paid for by the customer. These references are consistent across dates.
- k. Confirmed. A day spans midnight to midnight, eastern time.
- l. Confirmed. To maintain consistency in the database, midnight to midnight times are used notwithstanding the cutoff time for transmissions to the printer.

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OCA/USPS-17. Please refer to the MOL Weekly Reports filed on December 3, 1998.

- a. Please confirm that the Market Test of MOL has been operational since October 30, 1998. If you do not confirm, please provide the correct date.
- b. Please confirm that between October 30 and November 13 there was nonzero volume for MOL on the following dates: 31-Oct, 3-Nov, 5-Nov, 6-Nov, 7-Nov, 9-Nov, 10-Nov, 11-Nov, 12-Nov, and 13-Nov. If you do not confirm, please provide the correct dates.
- c. Please confirm that the only day on which MOL volume exceeded double digits was 5-Nov. If you do not confirm, please list all dates on which MOL volume exceeded 99.
- d. Please confirm that on 5-Nov there were three transactions from three different mailers. If you do not confirm, please provide the correct numbers and show their derivation.
- e. Please confirm that on 5-Nov, one transaction consisted of three printed pages (simplex, spot color), one transaction consisted of 1085 printed pages (duplex, b&w), and one transaction consisted of 2406 printed pages (simplex, b&w). If you do not confirm, please provide the correct numbers and show their derivation.
- f. Please confirm that no batching of jobs occurred on 5-Nov. If you do not confirm, please explain.
- g. Please provide the number of *pieces* associated with each transaction on 5-Nov and show how these numbers can be derived from data in the MOL Weekly Reports.
- h. Please provide the Qualification Reports associated with the transactions appearing under 5-Nov in the MOL Weekly Reports.

RESPONSE:

- a. Confirmed that the Market Test started on October 30, 1998.
- b-d. An objection to these parts was filed December 14, 1998.
- e. Confirmed.
- f. Confirmed.
- g. The number of pieces for each job cannot be derived from the Weekly Reports. The three-page job consisted of three pieces; the 1085-page job consisted of 1085 pieces; and the 2406-page job consisted of 802 pieces.

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h. Our reporting plan is to provide Qualification Reports as part of the bi-weekly reports. To identify the reports from a specific date, however, we are awaiting installation of the software update originally planned for December 6, and later planned for December 20. As of 4:00 p.m. on December 18, 1998, when that update will be installed is still unknown; however, a best case would have it installed within a few days, while a worst case would have the update installed contemporaneously with changes necessitated by the forthcoming omnibus change in rates.

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OCA/USPS-18. Please refer to the response to interrogatory OCA/USPS-10d.

- a. Please provide a copy of the "user's guide" referred to in that response.
- b. Please provide hard copy of all "on-line help" screens referred to in that response.

RESPONSE:

- a-b. These are being provided in Library Reference USPS-LR-26/MC98-1.

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OCA/USPS-19. Please refer to Postal Service witness Plunkett's response to interrogatory OCA/USPS-T5-51d, filed December 7, 1998.

- a. Please confirm that for certain presort categories, MOL Qualification Reports will always have zero volume in those categories because the categories are not automation categories. If you do not confirm, please provide examples of MOL pieces that would fit in each category shown on a Qualification Report.
- b. Please indicate which presort categories on a Qualification Report will be used for MOL mailings and which will not.

RESPONSE:

- a. Confirmed
- b. The presort categories used on a given Qualification Report depend, in part, on the mail produced at the print site on that day. For example, if the volume for a particular document type requires, all of the automation categories applicable to the relevant shape could be used. In exceptional instances where volume for a particular document type is extremely low, it is possible that none of the presort categories would be used.

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OCA/USPS-20. Please refer to Postal Service witness Plunkett's response to interrogatory OCA/USPS-[T5-]51e, filed December 7, 1998. Please alter witness Plunkett's hypothetical slightly. "[C]onsider a customer who submits a 400[0]-piece Standard (A) mailing to Mailing Online, with 100[0] pieces going to each of four different 3-digit areas, each served by different printers."

- a. Please confirm that the presorting program used by Mailing Online *automatically* "distributes" pieces to print sites simply by presorting to greatest depth of sort. That is, when the 4000-piece mailing has been presorted, the "pieces going to each of four different 3-digit areas" will also have been identified and separated.
- b. Please provide an example of an MOL mailing that would not be sorted (i.e., "distributed") to print sites simply as a result of its being presorted to maximum depth of sort.
- c. Please explain why "distributing" to print sites first and then presorting is not wasteful, as it would appear that both "distributing" and presorting can be accomplished in a single pass.
- d. Please confirm that the total postage bill for the 4000-piece mailing is unaffected by the order in which "distributing" and presorting are done. If you do not confirm, please explain.
- e. Please provide an example of an MOL mailing for which the total postage bill *would* be affected by the order of "distributing" and presorting.
- f. Please confirm that *if* the total postage bill for an MOL mailing is unaffected by the order of "distributing" and presorting, then the depth of sort achieved by presorting the entire mailing in one pass must be functionally equivalent to the depth of sort achieved by first splitting the mailing among print sites and then presorting each print site's pieces separately. If you do not confirm, please explain and provide a counter-example; i.e., provide an example of an MOL mailing whose total postage bill is unaffected by the order of "distributing" and presorting but whose depth of sort *is* affected by the order of "distributing" and presorting.

RESPONSE:

- a. Confirmed.
- b. Given the parameters of the hypothetical, no such possibility appears to exist.

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- c. Distribution of documents to print sites as quickly as possible makes efficient use of network resources by spreading use of the network over time and minimizing peak loads. There is, moreover, no service benefit inherent in holding *documents* for later distribution. Presorting and distribution of *address lists* is accomplished in a single pass, once all the jobs for a given day have been obtained. This allows the full benefits of presorting to be achieved.
- d-e. Not confirmed. The order of distributing and presorting is not the issue, since these operations are done simultaneously for all of a given day's jobs. The timing of these operations can affect the postage bill, however, assuming that, unlike Mailing Online, more than one postage rate is available. If distribution and presorting are completed before another job for the same destination is entered, an opportunity to achieve greater presortation might be missed.
- f. Confirmed, assuming the question refers to the depth of sort for that one mailing.

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OCA/USPS-21. Are customers from Tampa and Hartford automatically customers of MOL for the Market Test? Would such customers be automatically purged from the rolls for failing to use MOL for 30 days (e.g., October 1 through October 30)? How many operations-test customers have used MOL during the Market Test? How much volume have such customers submitted?

RESPONSE:

All PostOffice Online operations test customers (actual users) were transferred to the Market Test without regard to the October down time. At least three such customers have availed themselves of Mailing Online during the market test, although no comprehensive tabulations of their activity have yet been prepared.

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OCA/USPS-22. Please refer to the "USPS Qualification Report," appearing at Tr. 6/1423.


- a. Please confirm that the abbreviations, CB, 5B, 3B, 3/5B, BB, BS, and SP refer to presort levels. If you do not confirm, please explain.
- b. Please confirm that the abbreviations referred to in part (a) of this interrogatory represent the following:
 - i. CB means Carrier Route for First-Class or Standard Mail (A), letter- or flat-shaped mail;
 - ii. 5B means 5-Digit Automation Presort for First-Class or Standard Mail (A) letter-shaped mail;
 - iii. 3B means 3-Digit Automation Presort for First-Class or Standard Mail (A) letter-shaped mail;
 - iv. 3/5B means 3/5-Digit Automation Presort for First-Class or Standard Mail (A) flat-shaped mail;
 - v. BB means Basic Automation Presort for First-Class or Standard Mail (A) letter- or flat-shaped mail;
 - vi. BS means Regular Presort for First-Class letter-shaped mail, and;
 - vii. SP means Single Piece for First-Class letter- or flat-shaped mail.If you do not confirm, please provide the correct definitions.

RESPONSE:

An objection to this interrogatory was filed on December 14, 1998.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 18, 1998